



February 6, 2006

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060  
EB Docket No. 06-36  
CC Docket No. 96-115 and WC Docket No. 05-196  
Certification of CPNI Filing (February 6, 2006)**

Dear Secretary Dortch:

Pursuant to the Commission's Public Notice released on January 30, 2006, attached is the annual certification of Wholesale Carrier Services, Inc. in compliance with section 64.2009(e) of the Commission's rules, 47 C.F.R. §64.2009(e).

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

**Chris S. Barton  
President & Chief Executive Officer**

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**WHOLESALE CARRIER SERVICES, INC.**  
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**www.wcs.com**



**WHOLESALE CARRIER SERVICES, INC.  
ANNUAL SECTION 64.2009(e) CERTIFICATION**

I, Chris S. Barton, a duly authorized officer of Wholesale Carrier Services, Inc. hereby certify on behalf of Wholesale Carrier Services, Inc. that I have personal knowledge that the Company has operating procedures as described in the attached statement that to the best of my knowledge, information and belief are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

A handwritten signature in dark ink, appearing to read 'Chris S. Barton', is written over a horizontal line.

Chris S. Barton  
President & Chief Executive Officer  
Wholesale Carrier Services, Inc.  
February 6, 2006

A large, faint, light-blue watermark of the WCS logo is centered on the page. It consists of a wide, shallow arch above the large, bold letters 'WCS'.



WE MAKE YOUR NETWORK

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of Wholesale Carrier Services, Inc. to ensure that it is in compliance with the Commission's CPNI rules.

Wholesale Carrier Services, Inc. does not use CPNI for marketing purposes. The Company uses CPNI internally for the purpose of providing a customer with the requested service. The Company also uses CPNI internally for the actions identified below.

- (1) to bill and collect for services rendered;
- (2) to provision inside wiring installation, maintenance, and repair services; and
- (3) to protect the rights or property of Wholesale Carrier Services, Inc. or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Wholesale Carrier Services' Inc. services.

Wholesale Carrier Services', Inc. procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted under the statute or by Commission rule.

The protection of customer information is a priority for Wholesale Carrier Services, Inc. The Company's employees are trained to secure CPNI and related confidential information. As noted above, the Company does not engage in marketing campaigns nor does the Company sell, disclose or otherwise distribute CPNI to third parties.



**WCS**